

Senedd Cymru  
Y Pwyllgor Newid Hinsawdd, Amgylchedd a  
Materion Gwledig  
Craffu ar Fframwaith Datblygu Cenedlaethol  
Cymru  
CCERA(5) NDF(v2) 10  
Ymateb gan Savills ar ran Walters Land Limited

Welsh Parliament  
Climate Change, Environment and Rural Affairs  
Committee  
National Development Framework for Wales  
CCERA(5) NDF(v2) 10  
Evidence from Savills on behalf of Walters Land  
Limited



Savills, instructed by Walters Land Ltd, made representations on the draft NDF (DNDF) in November 2019 in respect of the proposals within it to direct that the South East Wales Strategic Development Plan (SEWSDP) must include a green belt.

The main objection was to draft Policy 30 – Green Belts in South East Wales. This stated that:

*The Welsh Government requires the identification of green belts through a Strategic Development Plan to manage urban form and growth in South East Wales, particularly around Newport and the eastern part of the region.*

*Regional plans should consider the relationship of any new green belts with the green belt around Bristol.*

Walters Land Ltd objected to Policy 30 in its entirety, and to the proposal that the SEWSDP must include a green belt for the following reasons:

1. The Green Belt has been proposed without any published evidence base or assessment to support it.
2. As drafted the NDF prejudices the ability of the SEWSDP to properly plan for the region by imposing a long term restriction on a large swathe of the plan area.
3. Newport is identified as an area that is expected to accommodate significant growth. Newport should not be constrained in planning for their growth by a poorly evidenced Green Belt, particularly when they state their clear concerns about the ability to accommodate growth within the city and state that greenfield development and controlled expansion into the countryside is inevitable.
4. The degree of permanency of a Green Belt will undermine the ability of development plans to react to changing needs for growth and undermine LDPs that are coming forward.
5. A Green Belt designation is likely to lead to unsustainable growth beyond it and/or unintended consequences of increased house prices and negative impacts on well-being through stifling development.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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The above concerns were echoed by the representations made by the Cardiff City Region authorities who objected to the proposed Green Belt on the following grounds:

- the draft NDF is too prescriptive, particularly given the apparent absence of detailed evidence and analysis to support this requirement.
- If it were proposed as part of an SDP or LDP in this way it would not meet the tests of soundness without robust evidence to support it and it is not reasonable that the NDF has a lower bar for evidence required to support it when it is being so prescriptive.
- It would act to hinder growth in an areas of significant demand and potential.
- It would undermine the role of the SDP and pre-determine the growth strategy to follow which needs to be supported by robust evidence.
- The strategy (to restrict green field releases) is unlikely to deliver the sustainable development needed to meet the needs of the future generations of Wales.

Disappointingly the objections to the Green Belt policies have not been resulted in any changes which reflect the volume and breadth of the concerns raised. In fact the changes to the policy make it more onerous and potentially more damaging to the ability to plan sustainably for future development in Wales.

One of the notable additions to Policy 34 is the requirement that Local Planning Authorities do not grant planning permission for major development and LDPs do not make large scale allocations in parts of the Region subject to consideration for inclusion within the Green Belt (as shown in the regional strategic diagram).

Such an approach would effectively impose a moratorium on development across an area where no strategic appraisal has been undertaken as to the need or justification for a green belt . This is likely to restrict development in sustainable locations. Furthermore, the current diagram is difficult to interpret and ambiguous which could lead to sustainable sites for short to medium term growth being unnecessarily stifled.

It is respectfully suggested that a Green Belt policy is not a justified approach and the green belt polices should be removed or, as a minimum that recently added text stating that LDPs should not make large scale allocations in parts of the South East Wales Region subject to consideration for inclusion within the Green Belt should be deleted.

If a Green Belt policy is to be retained, it should be left to Local Authorities to define its extent through the preparation of the South East Wales SDP with the instruction for its designation contained within the WDFW removed. An evidence-based approach must be adopted if this approach is taken.